

EXHIBIT A

TOPICS OF TESTIMONY

Pursuant to Federal Rule of Civil Procedure 30(b)(6), the officer(s), director(s), managing agent(s), or other person(s) whom Defendant Feitian Technologies Co., Ltd. ("Feitian") will designate to testify on its behalf should know or have information reasonably available regarding the facts and issues surrounding the following topics:

1. Advertising by Feitian or on its behalf in the United States ("U.S.") or directed to the U.S. market during the period October 1999 to present, including, but not limited to print publications and online advertising conducted on the Internet.
2. Marketing efforts directed to the U.S.
3. Business trips to the U.S. by Feitian personnel during the period October 1999 to present.
4. Participation by Feitian in trade shows and industry conferences in the U.S. during the period October 1999 to present.
5. The operations of Feitian's interactive English language website.
6. Feitian's sales operations in the U.S. or directed to the U.S.
7. The procedures for tracking and responding to an inquiry originating in the U.S. concerning a product or service offered by Feitian.
8. The procedures for tracking and responding to a request originating in the U.S. to purchase a product or service of Feitian.
9. Shipping/exporting operations and procedures for importing Feitian products and services into the U.S.
10. Feitian's procedures for receiving and responding to a request in or from the U.S.

for technical assistance or technical support.

11. The customer relations management tools used by or for Feitian during the period October 1999 to present.

12. The prospect management software used by or for Feitian during the period October 1999 to present.

13. The referral tracking procedures used by or for Feitian during the period October 1999 to present.

14. Sales to or in the U.S. of Feitian products, including, its “ePass” and “Rockey” products during the period October 1999 to present.

15. Services for or on behalf of a customer located in the U.S. relating to Feitian products, including, its “ePass” and “Rockey” products during the period October 1999 to present.

16. Offers for sale to or in the U.S. of Feitian products, including, its “ePass” and “Rockey” Software Developer Kits, during the period October 1999 to present.

17. Revenues relating to sales in the U.S. of Feitian products, including, its “ePass” and “Rockey” Software Developer Kits during the period October 1999 to present.

18. Revenues relating to services in or to the U.S. for Feitian products, including its “ePass” and “Rockey” products.

19. Contacts with any Feitian “Solution Partner” operating in the U.S.

20. Contacts with any Feitian “distributor” operating in the U.S.

21. The agreements executed by or on behalf of Feitian that apply Delaware law.